

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., et al.,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 4037, 5378, 5529 & ____

ORDER ESTABLISHING A SCHEDULE FOR THE FTX EUROPE MOTIONS

Upon the motion (the “Motion”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) establishing a schedule for the *Motion of Debtors For Entry of An Order (I) Authorizing and Approving (A) Entry Into, and Performance Under, the Share Purchase Agreement and (B) the Purchase and Sale of Certain Shares Free and Clear of Liens, Claims and Encumbrances and (II) Dismissing the Chapter 11 Cases of Certain Debtors Effective Upon the Earlier of the Closing or the Termination of the Share Purchase Agreement* [D.I. 5378] (the “FTX Europe Sale Motion”), the *Motion of Dr. Marcel Lötscher to Dismiss Bankruptcy Case of FTX Europe AG* [D.I. 4037] (the “Lötscher Motion”), and the *Motion of Martha Lambrianou to Dismiss Bankruptcy Case of FTX EU Ltd.* [D.I. 5529] (the “Lambrianou Motion,” together with the Lötscher Motion, the “Objector Motions” and collectively with the FTX Europe Sale Motion and the Lötscher Motion, the “FTX Europe Motions”); and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The schedule set forth below shall govern the adjudication of the FTX

Europe Motions with such deadlines subject to extension upon written agreement of the Parties or further order of the Court:

EVENT	DEADLINE
Completion of Fact Discovery	Friday, March 29, 2023
Deadline to Exchange Any Expert Witness Disclosures and Reports	Friday, April 5, 2023
Completion of Any Expert Discovery	Friday, April 19, 2023
Objections or Responses to any of the FTX Europe Motions	Friday, April 26, 2023

Replies to Objections/Responses to any of the FTX Europe Motions	Wednesday, May 10, 2023
Evidentiary Hearing on FTX Europe Motions ³	On or after May 13, 2023 as scheduled by the Court

3. The objection deadline with respect to the Lambrianou Motion is adjourned consistent with the schedule set forth in paragraph 2 of this Order.

4. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

³ The Parties' rights are reserved with respect to the sequencing of the Court's consideration of the FTX Europe Motions, which shall be addressed following discovery.